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**IN THE DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

LI FENFEN,)	Civ. No. 07-0033
)	
Plaintiff,)	
)	
vs.)	ANSWER TO
)	COUNTERCLAIM
SEAHORSE INC. SAIPAN,)	
)	
Defendants.)	

COMES NOW Plaintiff Li Fenfen, by and through counsel, and answers the allegations in Defendant's Counterclaim as follows:

1. Plaintiff admits the allegations in paragraphs 1 and 2 of the Counterclaim.
2. Plaintiff denies the allegations in paragraphs 3 and 11 of the Counterclaim.
3. Plaintiff lacks knowledge sufficient to form a belief as to the truth of the allegations in paragraphs 5 and 10 of the Counterclaim, and on that basis denies the same.
4. With respect to the allegations in paragraph 4 of the Counterclaim, Plaintiff admits that venue is appropriate in this jurisdiction, but denies that her claim involves a vessel on a voyage in navigable waters, and denies for lack of sufficient knowledge the make, model, and identification number alleged.

1 2. The Counterclaim is barred by the applicable statute of limitations.

2
3 3. The federal laws forming the basis of the Counterclaim are inapplicable in the CNMI.

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5 4. Defendant has waived its right to assert this counterclaim and/or is estopped from
6 asserting it.

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8 WHEREFORE Plaintiff prays that the relief sought by Defendant by way of its counterclaim
9 be denied.

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11 Respectfully submitted this 17th day of December, 2007.

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13 O'CONNOR BERMAN DOTTS & BANES
14 Attorneys for Plaintiff

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16 By: _____/s/_____
17 Joseph E. Horey

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19 *3414-01-071217-answer to counterclaim.wpd*